

REMARKS

Reconsideration of the pending application is respectfully requested on the basis of the following particulars:

In the claims

Claim 1 is amended to more clearly express the "loosely held" nature of the fibers according to the present invention, by indicating that the fiber bundles are loosely held in a holder, the fibers have far ends protruded from the holder and subjected to an end grinding process, and free ends opposite the far ends rest loosely on the surface of an underlying support. Support for this amendment is found at lines 8-15 of page 4 of the original specification.

Rejection of claims 1, 2, 4, 6-10, and 12-16 in view of *Weihrauch*

Claims 1, 2, 4, 6, 8, 10, and 12-16 presently stand rejected as being anticipated by *Weihrauch* (U.S. 5,176,427), and claims 7 and 9 are rejected as being unpatentable over *Weihrauch*. These rejections are respectfully traversed for at least the following reasons.

Claim 1 is amended, as discussed above, to further clarify the "loosely held" nature of the fibers during processing according to the invention, by indicating that, in addition to being loosely held in a holder, the fiber ends rest loosely on the surface of an underlying support.

It is respectfully submitted that *Weihrauch* fails to disclose or suggest that fibers are loosely held during an end grinding or polishing process, since *Weihrauch* clearly states that bristle bundles are fixed, not loosely held, by a fixing device. Applicant respectfully submits that the nature of the "loosely held" bristles of the present invention is abundantly clear in view of the present application (meaning that none of the fibers are clamped or fixed), and clamping or fixing of the bristles is clearly contrary to the nature of the "loosely held" bristles.

Weihrauch clearly does not disclose or suggest that bristle ends *rest loosely on the surface* of an underlying support, as is now recited in claim 1. According to Weihrauch, the bristles are fixed in a fixing device 7, or alternatively fixed by the bristle carrier of a brush. (see *Weihrauch*; col. 6, lines 50-56).

Moreover, the Examiner appears to consider fibers "attached to a bristle carrier rather than being placed in the fixing device 7" to constitute fibers resting on an underlying surface, since the Examiner considers that "the free ends are resting within the bristle carrier." (see page 2 of the recent Office action). Applicant respectfully disagrees. Weihrauch states that, alternatively to fixing the bristles by a fixing device 7, essentially the fixing device "can be directly formed by the bristle carrier of the brush, to which the bristle bundles 9 are already fixed." (*Weihrauch*; col. 6, lines 54-56). That is, Weihrauch clearly states that, if a bristle carrier is used alternatively to the fixing device, the bristle bundles 9 *are fixed to* the bristle carrier. Applicant respectfully submits that bristles being *fixed to* the bristle carrier is contrary to the meaning of bristles or fibers *resting on* a support.

Moreover, given that the bristles are fixed to the bristle carrier, they cannot be said to be resting loosely on the surface of the bristle carrier.

Applicant notes that the feature of processing the fiber end while the fibers are loosely held, and loosely rested on a supporting surface (that is, the fibers are not clamped or fixed) results in advantages such as a simplification of the manufacturing process. (see for example lines 25-27 of page 3 of the present application). Moreover, it has been observed by the Applicant that, as the fibers are not clamped or fixed, the fibers have the capacity to move, or migrate, in position relative to one another during the grinding or polishing operation. As experienced by the Applicant, this is advantageous in contributing to a good end rounding result.

For at least these reasons, it is respectfully submitted that Weihrauch does not disclose or suggest each and every element of claim 1, and therefore claim 1, along with

claims 2, 4, and 6-20 which depend from claim 1, are allowable over the cited reference, and withdrawal of these rejections is requested.

Rejection of claims 11 and 17-20 under 35 U.S.C. § 103(a)

Claim 11 presently stands rejected as being unpatentable over Weihrauch in view of Boucherie (U.S. 6,290,303, hereafter Boucherie '303), and claims 17-20 are rejected as unpatentable over Weihrauch in view of Boucherie (U.S. 5,728,408, hereafter Boucherie '408). These rejections are respectfully traversed for at least the following reasons.

It is respectfully submitted that neither Boucherie '303 nor Boucherie '408 supplement the deficiencies of Weihrauch discussed above with respect to the features of claim 1. Accordingly, neither Boucherie '303 nor Boucherie '408 in combination with Weihrauch forms a prima facie case of obviousness of claim 1, or any of claims 11 and 17-20 which depend from claim 1.

In particular, neither Boucherie '303 nor Boucherie '408 discloses or suggests placing a bundle of fibers loosely held in a holder, the fibers having far ends protruded from the holder and subjected to an end grinding process, and free ends opposite the far ends resting loosely on the surface of an underlying support.

Boucherie '303 discloses a method for fixing brush fibers in a brush body, wherein the fibers are transferred to a holder. There is no teaching or suggestion that the fibers are *loosely held* by the holder, or that the fibers are loosely held (that is, not clamped or fixed) during the process. Moreover, it should be noted and appreciated that the process disclosed by Boucherie '303 does not involve any contact between free ends of the fibers and a processing equipment. Accordingly, Boucherie '303 is not concerned with, and does not consider, potential problems of processing fiber ends while loosely held (such as drawing fibers out of their holders) resulting from contact of a processing equipment to loosely held fibers. That is, it is respectfully submitted that persons of ordinary skill in the art would not find teachings as to how fibers are held in *a non-contact process* to be applicable to holding fibers in *a contact process*.

Boucherie '408 is silent as to how fibers are held during an end grinding process. While Boucherie '408 discloses, referring to Fig. 9, a rotating disk 80 apparatus for moving fiber bundles from one processing station to another, Boucherie '408 does not describe any of these processes, and in particular an end grinding process, in any detail. That is, even assuming, *arguendo*, that fiber bundles are loosely held by the a rotating disk 80 apparatus, there is no teaching or suggestion that they remain loosely held by an end grinding apparatus during an end grinding process.

Hence, it is respectfully submitted that neither Boucherie '303 nor Boucherie '408 in combination with Weihrauch forms a prima facie case of obviousness of claim 1, and therefore claims 11 and 17-20 are allowable at least due to their dependency. Accordingly, withdrawal of these rejections is requested.

Conclusion

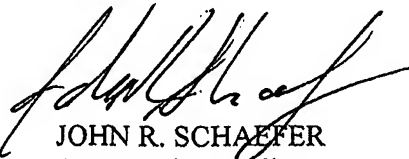
In view of the amendments to the claims, and in further view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is requested that claims 1, 2, 4, and 6-20 be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the Applicant's attorney, the Examiner is invited to contact the undersigned at the numbers shown.

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Respectfully submitted,


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